ATTORNEY DOCKET NO.   PATENT APPLICATION
063170.6269   09/427,263

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REMARKS

This Application has been carefully reviewed in light of the Office Action mailed January 11, 2006 (the "Office Action"). At the time of the Office Action, Claims 1-5, 12, 31-35, 41, 56-58 and 60 were pending in the application. The Examiner rejects Claims 1-5, 12, 31-35, 41, 56-58 and 60. Applicant respectfully requests reconsideration and allowance of all pending claims.

Section 102 Rejections

The Examiner rejects Claims 1-5, 12, 31-35, 41, 56-58 and 60 under 35 U.S.C. §102(b) as being anticipated by the publication, "An Object-Oriented Approach to Directory Systems" by C.M.R. Leung, IEEE Region 10 Conference on Computer and Communications Systems, September, 1990, Hong Kong, pages 736-740, ("Leung"). Applicant respectfully traverses this rejection and requests reconsideration and allowance of Claims 1-5, 12, 31-35, 41, 56-58 and 60 in view of the remarks set forth herein.

Leung fails to support the rejection of Claim 1 for at least two reasons. First, Leung fails to teach, suggest, or disclose "storing concurrently in a first table and a second table...both the syntax-normalized form and the raw form of said data" as recited, in part, in Claim 1. Second, the cited reference fails to teach, suggest, or disclose "storing the at least one attribute identifier in an attribute table" as recited, in part, in Claim 1.

First, Leung fails to teach, suggest, or disclose "storing concurrently in a first table and a second table...both the syntax-normalized form and the raw form of said data" as recited, in part, in Claim 1. In the Office Action, the Examiner equates the DIT table in Leung with the "first table" recited in Claim 1, and the Examiner equates the ENTRY table in Leung with the "second table" recited in Claim 1. (Office Action; p. 4, l. 5). Notably, only the ENTRY table in Leung stores data in "both normalized and raw forms." (Leung; p. 738, Fig. 6; p. 739, col. 1, ¶ 1). Leung specifically teaches that the ENTRY table "holds the system identifier of an object, and an attribute value of an attribute type of the object in both normalized and raw forms." (Leung; p. 739, col. 1, ¶ 1). In contrast, the DIT table merely holds "the system identifier of an object, that of its parent, and its RDN." (Leung; p. 739, col. 1, ¶ 1). Thus, only one table in Leung -- the

ENTRY table -- stores both normalized and raw forms of data. (*Leung*; p. 738, Fig. 6; p. 739, col. 1, ¶ 1). There is nothing in *Leung* that teaches, suggests, or discloses storing both normalized and raw data in the DIT table. As a result, *Leung* fails to teach, suggest, or disclose "storing concurrently in a first table *and* a second table...both the syntax-normalized form and the raw form of said data" as recited, in part, in Claim 1. (Emphasis added). Because *Leung* fails to teach, suggest, or disclose this aspect of Claim 1, *Leung* fails to support the rejection.

Second, the cited reference fails to teach, suggest, or disclose "storing the at least one attribute identifier in an attribute table" as recited, in part, in Claim 1. *Leung* discloses storing data in two tables -- a DIT table and an ENTRY table. (*Leung*; p. 739, col. 1, ¶ 1). In the Office Action, the Examiner equates the DIT table with the "first table" recited in Claim 1, and the Examiner equates the ENTRY table with the "second table" recited in Claim 1. (Office Action; p. 4, l. 5). If the DIT table is equated with the "first table" recited in Claim 1 and the ENTRY table is equated with the "second table" recited in Claim 1, then there is nothing in *Leung* that teaches, suggests, or discloses "an attribute table" as recited in Claim 1. The Examiner overlooks this fact by citing a portion of *Leung* that describes storing attribute values in the ENTRY table. (*Leung*, col. 1, ¶ 1). However, in contrast to *Leung*, Claim 1 recites "storing the...attribute identifier in an attribute table" -- **not** in "the second table" (i.e., the ENTRY table). Notably, storing attribute values in the ENTRY table (i.e., "the second table" recited in Claim 1) does not teach, suggest, or disclose "an attribute table" or "storing the at least one attribute identifier in an attribute table" as recited, in part, in Claim 1. It is well established that a "claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). In addition, "[t]he identical invention *must* be shown in as complete detail as is contained in the...claim," and "[t]he elements *must* be arranged as required by the claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989); *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990); MPEP § 2131 (emphasis added). Because *Leung* fails to teach, suggest, or disclose

"storing the at least one attribute identifier in an attribute table" as recited, in part, in Claim 1, *Leung* fails to support the rejection.

In rejecting Claims 12, 31, 41, and 56, the Examiner employs a rationale analogous to that used in rejecting Claim 1. Accordingly, for reasons analogous to those stated above with respect to Claim 1, Applicant respectfully requests reconsideration and allowance of Claims 12, 31, 41, and 56.

Claims 2-5, 32-35, 57-58 and 60 depend from independent claims shown above to be allowable. In addition, these claims recite further elements not taught, suggested, or disclosed by the cited reference. For example, *Leung* fails to teach, suggest, or disclose "first obtaining a raw form of a data and thereafter generating said syntax-normalized form from said raw form of the data" as recited, in part, in Claim 2. *Leung* discloses storing data in an ENTRY table "in both normalized and raw forms." (*Leung*; p. 739, col. 1, ¶ 1). However, merely *storing* a normalized form of data does not teach, suggest, or disclose "*generating* said syntax-normalized form" as recited, in part, in Claim 1. (Emphasis added). *Leung* specifically teaches that the "only" operations for changing the data in the system are "insert, update, or delete." (*Leung*; p. 739, col. 1, ¶ 4). *Leung* does not mention "generating...syntax-normalized form" as recited, in part, in Claim 1. Thus, the cited reference fails to teach, suggest, or disclose "first obtaining a raw form of a data and thereafter generating said syntax-normalized form from said raw form of the data" as recited, in part, in Claim 2. For at least the foregoing reasons, Applicant respectfully requests reconsideration and allowance of Claims 2-5, 32-35, 57-58 and 60.

CONCLUSION

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests reconsideration and full allowance of all pending claims.

If there are matters that can be discussed by telephone to further the prosecution of this Application, Applicant invites the Examiner to call the undersigned attorney at (214) 953-6581 at the Examiner's convenience.

Although Applicant believes that no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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